



North Carolina Department of Environment and Natural Resources

Dexter R. Matthews, Director

Division of Waste Management

Michael F. Easley, Governor
William G. Ross Jr., Secretary

August 5, 2005

Ms. Christa Dean
Surface Transportation Board
Case Control Unit
Washington, DC 20423

Subj: Environmental Assessment, STB Docket No. AB-290 (Sub-No. 243X)
Norfolk Southern Railway Company – Abandonment Exemption
Forsyth County, North Carolina

Dear Ms. Dean,

The North Carolina Division of Waste Management is in receipt of the Environmental Assessment (EA), STB Docket No. AB-290 (Sub-No. 243x) which describes the proposed abandonment of part of the Roanoke-Winston-Salem railroad line by the Norfolk Southern Railway Company (NS). The railroad segment proposed for abandonment is adjacent to property at 501 East Third Street on which environmental impacts have been reported to the Division of Waste Management (DWM). This office has reviewed the EA (attached) and the following comments are offered for your consideration.

1. As noted in the EA, a portion of the proposed railroad segment is adjacent to the former Camel City Cleaners site located at 501 East Third Street in Winston-Salem, North Carolina. The EA concludes that the former Camel City Cleaners operation is topographically down gradient of the railroad line, and therefore it is unlikely that dry-cleaning operations have caused a significant impact to the railroad bed. Based on the information reviewed to date, we generally concur with the EA that the former dry-cleaning operations at 501 East Third Street are not likely to have contributed to impacts to the railroad bed.
2. In addition to the Camel City Cleaners operations, the subject property was also formerly occupied by a manufactured gas plant (MGP). The MGP was constructed in approximately 1900 and operated until approximately 1958 (see attached Figures 1, 2 and 3). The plant is commonly referred to as the Camel City MGP site. Through an Administrative Order on Consent (AOC), Docket 00-SF-192 between Duke Energy and DWM, Duke Energy is responsible for addressing the MGP and dry-cleaners related impacts associated with the site.
3. Along the eastern embankment of the subject rail line between Third and Fourth Streets, remnants of brick and wooden structures associated with the former gas plant are evident. During Duke Energy's investigation of environmental impacts from the gas plant and dry-cleaners operations, surface soil on the embankment was sampled and tested for the presence of MGP related compounds (see attached Figure C-1 for soil sample locations). The results of the analyses indicate significant levels of poly-cyclic aromatic hydrocarbons (PAHs) in

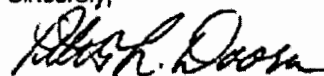
the upper 12 inches of soil. The data in Table 1 below summarizes results from the surface soil samples along the embankment with comparison to relevant target clean-up concentrations.

4. At this time, Duke Energy has essentially completed the soil investigation and additional investigation of the extent of ground water contamination is ongoing. Remediation of soil contaminated with dry-cleaning residuals has been conducted on the property. Soil remediation of the embankment has not been conducted due to proximity of the railroad line. Based on the analytical results presented below, it is expected that remediation of the embankment soil will be necessary when access becomes feasible.
5. As of this writing, the ownership of the Camel City Cleaners parcel has been transferred to a prospective developer. The purchaser is negotiating a Brownfields agreement with the DWM and has proposed developing a research facility to support Wake Forest University. Under the existing AOC, Duke Energy will retain responsibility for addressing environmental impacts resulting from the former MGP and dry-cleaning operations. The prospective developer has indicated a desire to begin construction activities soon after acquiring the Camel City Cleaners parcel. Since the Camel City Cleaners parcel is relatively small and in close proximity to the rail line, coordination between NS, Duke Energy, and the prospective developer will be necessary to successfully accomplish the railroad abandonment, the anticipated embankment remediation, and the construction of a research facility at the site.

In conclusion, this office strongly recommends that NS notify Duke Energy of the proposed railroad abandonment schedule at least ninety (90) days prior to initiating the proposed abandonment activities. First, such notification and coordination will assist NS in determining if additional health and safety precautions are needed when this portion of the rail line is abandoned. Secondly, it is anticipated that remediation of the embankment soil will be needed and the railroad abandonment activities may affect which remedy is selected and when it is implemented. Finally, the potential redevelopment of the Camel City Cleaners parcel may result in significant construction congestion at the site if railroad abandonment and/or embankment remediation activities are undertaken at the same time.

If you have any questions, please call me at (919) 508-8454.

Sincerely,

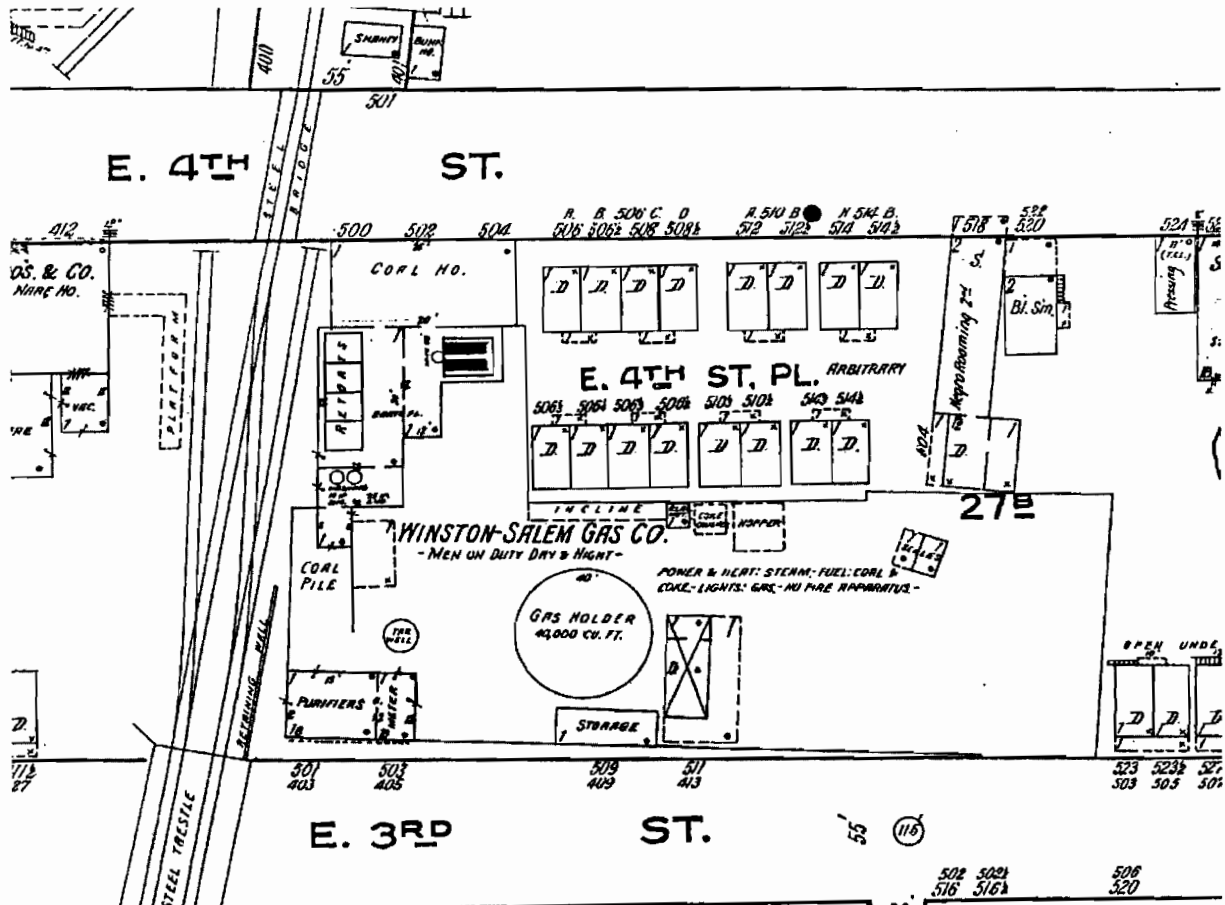


Peter L. Doorn, L.G.,
Special Remediation Branch
NC Superfund Section

cc: John Powers, Superfund Section
Tony Duque, Brownfields Program
Cindy Rintoul, UST Section, WSRO
Ralph Roberts, Duke Energy

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Figure 2 – Sanborn Map, 1917 - Winston-Salem, NC



GE BLDG
BUILT 1922-23
FLOORS & ROOF

WHITE

R. J. REYNOLDS TOBACCO
CIGARETTE PAPER & CARTON S.
EXTERIOR WALLS CORRUGATED IRON ON STUDDING WITH BR.
PIERS 16" X 26" EVERY 10 FEET
No 69 No 68
"DRY" "DRY"
WOOD POSTS

E. 4TH ST.

CAMEL CITY LAUNDRY & DRY CLEANING PLANT
CONC. BL.
CONC. PL.
STEEL TRUSSES
BR. PILLARS

DUKE POWER CO. GAS PLANT 27
MEN ON DUTY DAY & NIGHT
POWER & HEAT STEAM FUEL
ELECT. & CONG. LIGHTS ELEC.
NO FIRE APPS.
GAS HOLDER 90000 CU. FT.
GAS HOLDER 240000 CU. FT.

WATER GAS PLANT
ALL STEEL CONSTRUCTION
CONC. PL. 10' 2'

E. 3RD ST.

ALLEY

GE BLDG
Built 1922-23
FLOORS & ROOF
VR

WHITE

R. J. REYNOLDS TOBACCO

CIGARETTE PAPER & CIGARETTES

EXTERIOR WALLS CORRUGATED IRON ON STUDDING WITH BR.
PIERS 16X20, EVERY 10 FEET

Nº 69

№ 68

E. 4TH ST.

CAMEL CITY LAUNDRY & DRY CLEANING PLANT

CIN. DE.
CONG. PL.
STEEL TRUSSES
DR. FILASTORS

DR. GARD.

AS

W. HALL

HALL

DUKE POWER CO. - SAS PLANT 27

MEN ON DUTY DAY & NIGHT
 POWER & HEAT STEAM FUEL
 COAL & COKE - LIGHTS ELEC:
 NO FIRE APPS.

GRS HOLDEN
92008CU.F

GAS HOLDER
CARGY 287,000 CU FT

~~E. 3RD~~ ST.

6-11-68

TABLE 1 – Soil Sample results from Norfolk Southern railroad embankment adjacent to Camel City manufactured gas plant site at 501 E. Third St., Winston-Salem, NC.

Soil Sample Location	Total PAHs (mg/kg)	Total CPAHs ¹ (as BaP equivalent) (mg/kg)	Benzo(a)pyrene (BaP) (mg/kg)
B-77	2,403.80	239.09	170.00
B-78	18.40	1.99	1.20
B-79	26.53	2.44	1.70
B-80	71.30	7.87	5.20
B-81	912.44	93.83	29.00
SS-01	19,041.00	1,694.70	1,200.00
Soil Remediation Goal (Residential) ³ (mg/kg)	NS ²	NS	0.062
Soil Remediation Goal (Industrial) ⁴ (mg/kg)	NS	NS	6.2

¹ Carcinogenic PAHs reported as benzo(a)pyrene equivalents

² No standard

³ Residential soil remediation goal (Residential RG): for benzo(a)pyrene, a carcinogen, the Residential RG corresponds to an excess lifetime cancer risk of 1×10^{-6}

⁴ Industrial soil remediation goal (Industrial RG): for benzo(a)pyrene, a carcinogen, the Industrial RG corresponds to an excess lifetime cancer risk of 1×10^{-4}